

**UNITED STATES COURT OF APPEALS  
FOR THE ELEVENTH CIRCUIT**

**Nos. 22-13410-H, 22-14099-H, 23-10387-H & 23-13177-H**

DONALD J. TRUMP, *et al.*,

Appellants,

v.

HILLARY R. CLINTON, *et al.*,

Appellees.

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**APPELLANTS' MOTION TO EXTEND TIME FOR REHEARING PETITION**

Appellants President Donald J. Trump, Alina Habba, Michael T. Madaio, Habba Madaio & Associates, Peter Ticktin, Jamie Alan Sasson, and The Ticktin Law Group, through counsel, respectfully move to extend the time for filing of a petition for rehearing by 30 days. The circumstances of the case and the interest of justice warrant granting the requested relief.

1. The Court's published decision in this case was rendered on November 26, 2025. Any petition for rehearing is due to be filed by December 17, 2025.

2. Undersigned counsel seeks additional time to consult with both the principal Appellant, President Trump, and the additional Appellants who are attorneys who are in a distinct procedural posture, including regarding the potential collateral impact of the district court judgment that was affirmed on appeal. To

permit adequate time for consultation between counsel and the principal Appellant as well as the attorney Appellants, an extension of time of 30 days is requested. The Court's decision addresses questions that have not previously been decided in this Court as well as issues of particular importance to individual attorney Appellants, and granting the extension of time is warranted to afford each Appellant an opportunity for review of, and consultation regarding, rehearing options.

3. In addition to case-specific factors, the conflicting schedules of appellate counsel and of the Appellants support the request for extension of time. Undersigned counsel is presently preparing for oral argument in this Court on December 10, 2025 in the consolidated appeals in *United States v. Alexander*, Nos. 23-11322 & 23-12282, and is scheduled to file the initial brief in *United States v. Polit*, No. 24-13432, on December 15, 2025 (a case involving allegations of foreign crimes by the former Comptroller of Ecuador). Also, co-counsel on appeal in this case is preparing for the hearing currently scheduled for December 19, 2025, in *Lee, et al., v. Trump*, D.D.C. No. 21-cv-00400-APM (addressing, on remand, first impression issues concerning the scope of civil liability of the President for official acts). Particularly in light of the holiday season also affecting the schedule of attorneys in the case and the press of work of the principal Appellant, granting the requested extension of time would serve the interest of justice.

4. Counsel for Appellants have consulted with counsel for the Appellees. Appellees have authorized the undersigned to represent that they take no position on the instant motion for extension of time.

WHEREFORE, Appellants respectfully request that this Court grant their motion to extend by 30 days the time for filing of a rehearing petition, such that any petition will be due on or before January 16, 2026.

Respectfully submitted,

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### **CERTIFICATE OF COMPLIANCE**

I hereby certify that this motion contains 445 words and complies with the typeface and type-style requirement of Fed. R. App. P. 32(a)(5) and (6) because it was prepared in a WordPerfect proportionally spaced Times New Roman 14-point font.

s/ Richard C. Klugh  
Richard C. Klugh, Esq.